

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOHN LEE GORE) CIVIL ACTION
Plaintiff,) Case NO.
vs.) CIVIL COMPLAINT
HARBOR FREIGHT TOOLS) JURY TRIAL DEMAND
1550 N. OLDEN AVENUE)
EWING, TWP NJ 08638)
ERIC SMIDT, CHAIRMAN &) RECEIVED
CEO,)
Defendant.)
AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

STATEMENT OF THE CASE

Comes now, JOHN LEE GORE, Pro se Plaintiff in the above caption matter, whom would respectfully move this Honorable Court on Civil Complaint that Plaintiff purchased a defective electric hand drill from the Defendant's Tool store, HARBOR FREIGHT, in Ewing, Township, NJ on May 12, 2022, that literally exploded in Plaintiff's hand on very first attempt to use, while working in Philadelphia, Pennsylvania.

JURISDICTIONAL STATEMENT

Plaintiff, seeks to have Civil Complaint adjudicated in the United States District Court, for the District of New Jersey under FEDERAL

JURISDICTIONAL QUESTION, based on the following facts:

- (1) The electric hand drill was manufactured in the State of California and sold in the State of New Jersey by the Defendant.
- (2) The **NEW**, and newly purchased electric hand drill, on first attempt at use, exploded in Plaintiff's hand on job site in Philadelphia, Pa. on May 13, 2022.
- (3) The Plaintiff resides in Mercer County, New Jersey, the same jurisdiction that **HARBOR FREIGHT TOOL STORE** is located and finally,
- (4), the medical facilities that treated Plaintiff and continues to treat Plaintiff is located in New Jersey. Wherefore, Plaintiff plead to this Honorable Court to exercise its jurisdiction and allow Plaintiff's case to be adjudicated in this Honorable Court.

COMPLAINT

It is the Complaint, ERIC SMIDT Chairman and CEO of Harbor Freight, the Respondeat superior is libel to Plaintiff for the in store sale of a defective electric hand drill that exploded in Plaintiff's hand causing Permanent nerve damage to Plaintiff's right hand and arm. Please see Photos of exploded drill and medical reports substantiating Plaintiff's claim attached as exhibit #1.

RELIEF SOUGHT

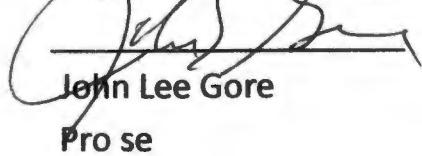
Plaintiff's nerve injuries has since, prohibited and at very least limited

jobs Plaintiff would ordinarily be able to do, and has made normal life very difficult, due to constant pain in Plaintiff's right hand, shoulder and arm. Plaintiff's monetary damage is based on the permanent damage and constant pain and suffering as a result of the injury.

Wherefore, Plaintiff seeks monetary jury award of \$2,000.000 for injuries sustained in the accident, the constant pain and suffering thereof and the inability to work for remainder of Plaintiff's life.

Plaintiff so pray.

Respectfully Submitted



John Lee Gore

Pro se